



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

N62578.AR.000466
NCBC DAVISVILLE
5090.3a

June 14, 1995

Mr. Robert Krivinskas
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1823 - Mail Stop 82
Lester, PA 19113-2090

Re: Comments on the Navy's Response to Comments on the Draft
Focused Feasibility Study (FFS) for Site 9, dated 6 May 1995, at
the former Naval Construction Battalion Center, RI

Dear Mr. Krivinskas:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA),
please find attached the Environmental Protection Agency's (EPA)
comments on the above referenced document.

The Navy must provide the information on the evaluation of the
impacts of the containment system on the surrounding wetlands and
neighboring properties in the FFS report.

Please contact me at (617) 573-5736, to arrange a meeting to
discuss the responses to these comments.

Sincerely,

Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Judy Graham, RIDEM
Lou Fayan, NCBC
Tim Prior, USF&WL
Bill Brandon, EPA
Jayne Michaud, EPA
Scot Gnewuch, ADL



EPA Comments on the Navy's Response to Comment on the Draft FFS Site 09, Allen Harbor Landfill, Naval Construction Battalion Center, Davisville, RI

1. The Navy's FFS does not demonstrate the amount of contaminants will migrate through or around the containment system proposed.

14 & 15. The Navy should not use the phrase "to the extent practicable" in the FFS text revision. The source control containment system evaluated should prevent the discharge of contaminated leachate or ground water to a "measurable performance criteria, mutually agreed upon between the Navy, EPA and RIDEM". This criteria would then be defined in the design stage.

16. When the Navy changes the design of the seaward component, the new design will have to be evaluated for protection from the 100 year storm.

18 & 22-26 & 53. The second paragraph of the response to #18 and the first paragraph of the response to #53 are not adequate and has not been adequately demonstrated. Has the Navy considered any other containment options that may be more cost effective and able to contain the deeper aquifer (till unit) beyond a sheet pile wall? The site specific contaminate transport modeling has not yet been conducted. The Navy should evaluate an alternative that will contain the more contaminated deeper aquifer (till unit) based on a mutually agreed upon performance criteria.

The source control remedy should contain all the known contaminants. The management of migration OU should then deal with the contaminants that cannot be contained.

27-30. EPA has requested that the Navy evaluate the short term contaminate transport, 1 tidal cycle, and then to add up the resulting contaminant flux for a year long indication of tidally-influenced contaminant flux. The risk of exposure to this flux should then be calculated for both human health cancer and non-cancer risks and ecological risks. The uncertainty of this analysis should then be presented so that the reader can evaluate the information.

70. A comparison of the mean yearly ground water contaminant flux should be made with the additive of the single tidal cycle ground water contaminate flux. (See original comments #18, 22-26 & 53)

71. Provide some references for the leakage of the sheet pile wall. The permeability of the sheet pile wall should be higher than the slurry wall due to the tidal influences.

72 & Attachment 2 specific Comment #1. The Navy must provide the information on the evaluation of the impacts of the containment system on the surrounding wetlands and neighboring properties in the FFS report. The settlement evaluation could be in an appendix.